

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

JUL 27 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Part 69 Allocation  
of General Support Facility CostsCC Docket No.  
92-222OPPOSITION

BellSouth Telecommunications Inc. ("BellSouth") hereby submits its opposition to MFS's Petition for Reconsideration of the Commission's Order in the above referenced proceeding.<sup>1</sup> Specifically, MFS asks that the Commission reconsider its decision to implement the reallocation of general support facilities (GSF) costs. MFS believes that the GSF reallocation should await Commission consideration of other LEC pricing issues. As discussed below, the Commission should deny MFS's petition.

In its petition, MFS complains that the reallocation of

to allocate GSF investment among service categories. Thus.

LEC services. Such a result does not promote competition-- it merely protects a class of competitors such as MFS.

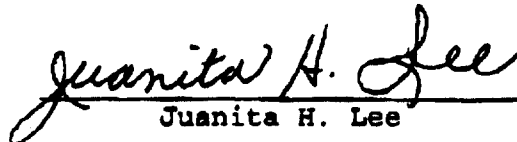
The Commission chose to make expanded interconnection for special access available without first conducting a comprehensive proceeding to realign all of its rules consonant with increased competitive environment being created. Having first taken the step to implement expanded

CERTIFICATE OF SERVICE

I, Juanita H. Lee, hereby certify that I have this 27th day of July, 1993, serviced all parties to this action, with a copy of the foregoing OPPOSITION, by placing a true and correct copy of same in the United States mail, postage prepaid, to the following persons.

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Juanita H. Lee